

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

**Case No. 3:23-md-3071
MDL No. 3071**

Honorable Waverly D. Crenshaw

**Declaration of Christopher Le on Behalf of
BoiesBattin LLP in Support of Scott &
Robins Leadership Application**

This Document Relates to: ALL CASES

**DECLARATION OF CHRISTOPHER LE ON BEHALF OF BOIESBATTIN LLP IN
SUPPORT OF SCOTT & ROBINS LEADERSHIP APPLICATION**

I, Christopher Le, pursuant to 28 U.S.C. §1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a member in good standing of the Commonwealth of Virginia and the District of Columbia.

2. I am a partner of the law firm of BoiesBattin LLP, counsel for plaintiff in *Lai Cheong v. RealPage, Inc. et al*, No. 3:23-cv-00416 (M.D. Tenn.), which is part of the above-captioned multidistrict litigation (the “MDL”).

3. Pursuant to this Court’s April 19, 2023 Order (ECF. No. 3) and the June 1, 2023 Order (ECF. No. 119), I submit this declaration in support of the Watters Plaintiffs’ Leadership Application submitted by Scott+Scott Attorneys at Law LLP and Robins Kaplan LLP (the “Scott & Robins Leadership Application”).

4. Founded in 1995, BoiesBattin LLP (“BoiesBattin”) has consistently been at the forefront of national efforts to hold corporations accountable for antitrust violations, consumer

fraud, and other unlawful conduct. The firm has successfully recovered hundreds of millions of dollars for class members across a broad variety of industries including, healthcare, food, vitamins, electronic components, and insurance products.

5. I have been a litigator for 15 years. During that time, either I or BoiesBattin have served in leadership positions in numerous different complex cases, including *In re Dynamic Random Access Memory (DRAM) Antitrust Litig.*, MDL No. 1486; the Northwestern Mutual Life Insurance Company annuity litigation (*LaPlant v. Northwestern Mutual Life Insurance Co.*, No. 11-00910 (E. D. Wis.)); *In Re: Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917; *In re Vitamin C Antitrust Litig.*, MDL No. 1738; *In Re: Lithium-Ion Batteries Antitrust Litig.*, MDL No. 2420; *In re Processed Egg Products Antitrust Litig.*, MDL No. 2002; and *In Re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827. Based on this experience and my understanding of the circumstances of this MDL, I support the Scott & Robins Leadership Application.

6. I am familiar with the work of Scott+Scott Attorneys at Law LLP (“Scott+Scott”) and Robins Kaplan LLP (“Robins”). BoiesBattin worked with Robins and/or Scott+Scott in a number of cases including the following: *In Re: Interior Molded Doors Indirect Purchaser Antitrust Litig.*, No. 18-cv-00850; *In Re: Local TV Advertising Antitrust Litig.*, MDL No. 2867; *In re: Hard Disk Drive Suspension Assemblies Antitrust Litig.*, MDL No. 2918; *In Re: Lithium-Ion Batteries Antitrust Litig.*, MDL No. 2420; and *In Re: Automotive Parts Antitrust Litig.*, MDL No. 2311. Working with Robins and Scott+Scott on these cases confirmed their well-deserved reputations as being professional, effective, and efficient counsel. They are extremely qualified to lead the Multifamily Plaintiffs in this MDL and I support the appointment of these two firms as interim co-lead counsel, as set forth in the Scott & Robins Leadership Application.

7. I am also familiar with the firms who are seeking appointment to the Plaintiffs' Steering Committee as part of the Scott & Robins Leadership Application. For example, BoiesBattin worked cooperatively and productively with the Joseph Saveri Law Firm in *In Re: Interior Molded Doors Indirect Purchaser Antitrust Litig.*, No. 18-cv-00850 (E.D. Va.) and *In re: Broiler Antitrust Litig.*, No. 16-cv-08637 (N.D. Ill.). BoiesBattin also worked with Cafferty Clobes Meriwether & Sprengel LLP in *In re: Blue Cross Blue Shield Antitrust Litig.*, No. 13-cv-20000 (N.D. Ala.). All the law firms seeking appointment to the Plaintiffs' Steering Committee as part of the Scott & Robins Leadership Application are well-respected firms with substantial experience litigating complex antitrust class actions. I support the appointment of these firms to positions on the Plaintiffs' Steering Committee.

8. BoiesBattin is available and willing to assist the Scott & Robins leadership team in prosecuting this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2023, in Fairfax, Virginia.

Christopher V. Le
BOIES BATTIN, LLP
Christopher V. Le
4041 University Drive, 5th Floor
Fairfax, VA 22030
Telephone: (703) 764-8700
Cle@boiesbattin.com